

**Nutter, McClennen & Fish, LLP**

Seaport West  
 155 Seaport Boulevard  
 Boston, MA 02210-2604  
 (617) 439-2000

Client No.: 0104614

October 28, 2012

Resp. Atty.: PJA

Bill No. 442624/03SLW

Sovereign Bank New England  
 75 State Street  
 Boston, MA 02109

Attention: John P. Bowen, Vice President

FOR PROFESSIONAL SERVICES rendered and unbilled through September 30, 2012 in connection with the following:

**Matter Name: Global Broadcasting of Southern New England LLC**  
**Matter No.: 00051**

**Billing Contact: Paul J. Ayoub, Esq. (Telephone no.: 617-439-2270)****Cost Center: 8413 - Other LLB Workout**

<u>Date</u>	<u>Description</u>	<u>Timekpr</u>	<u>Hours</u>
09/03/12	Review list of discovery items to be addressed	JFC	0.70
09/04/12	Draft settlement conference statement	JDP	1.80
09/04/12	Research regarding e-discovery obligations; review settlement conference statement	JFC	0.50
09/05/12	Prepare and serve settlement conference statement	JDP	0.30
09/05/12	Prepare for meeting with J. Bowen to review discovery items; review notes regarding discovery from call with A. Wiener; email to J. Bowen regarding meeting to discuss discovery issues; attention to file; review Defendant's Confidential Settlement Conference Statement; emails to J. Persky	JFC	2.90
09/06/12	Meet with J. Bowen; follow up; review documents in J. Bowen file; revise responses to request for production; review O'Brien personal financial statements	JDP	7.40

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<u>Date</u>	<u>Description</u>	<u>Timekpr</u>	<u>Hours</u>
09/06/12	Draft monthly update for bank; meet with J. Bowen regarding review of discovery requests propounded by O'Brien; attention to Rule 26; review electronic discovery rules regarding production of emails between counsel and receiver; review of loan file	JFC	3.90
09/07/12	Attention to response to document request; conference with J. Bardsley regarding access to electronic documents; voicemail for J. Dorsey regarding extension on document production	JDP	1.50
09/07/12	Attention to emails; telephone call regarding discovery items; review documents produced by bank including customer portfolio review report, risk rating change sheets, internal bank memoranda and watched asset reports for Global Broadcasting; discussion with J. Persky regarding discovery strategy; review email from [REDACTED]; attention to Quarterly Loss Assessment Form	JFC	3.20
09/10/12	Voicemail for J. Dorsey regarding extension of time to respond to discovery	JDP	0.10
09/10/12	Attention to discovery and prepare for mediation with Judge Almand; review settlement conference statement items sent by M. Russo and J. Dorsey	JFC	3.50
09/11/12	Conference with J. Bardsley regarding obtaining data for document review and litigation hold; emails with [REDACTED] regarding investigation	JDP	0.70
09/11/12	Attention to emails regarding [REDACTED] investigation; follow up regarding same; discussion regarding preliminary injunction; emails from [REDACTED] and J. Persky regarding scope of investigation; review updated credit report on K. O'Brien; email to J. Bowen regarding meeting tomorrow in Providence; prepare for mediation; review pleadings and cases cited therein	JFC	5.20
09/12/12	Prepare for and attend settlement conference; meetings J. Bowen; research personal financial statements and emails with [REDACTED]; draft motion for preliminary injunction	JDP	4.40
09/12/12	Prepare for mediation; review file documents and pleadings; attend mediation session with Judge Almand; attention to email regarding information needed for preliminary injunction enjoining the transfer of assets; review emails from [REDACTED]; discussion with M. Russo	JFC	6.20

[REDACTED] [REDACTED] [REDACTED] [REDACTED]

PAYMENT DUE UPON RECEIPT

BALANCES OVER THIRTY DAYS ARE SUBJECT TO A MONTHLY FINANCE CHARGE OF ONE AND ONE HALF PERCENT  
FEDERAL TAX ID: 04-2106505

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<u>Date</u>	<u>Description</u>	<u>Timekpr</u>	<u>Hours</u>
09/20/12	Evaluate results of [REDACTED] report; telephone call to California counsel; consider strategy regarding pursuit of fraudulent conveyance action in California; attention to issues regarding trustee process defendants	JFC	1.70
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
09/21/12	Conference with J. Bardsley regarding document production issues; emails with Russo regarding response to document requests; continue drafting amended complaint; research additional causes of action; review documents for production	JDP	5.40
09/21/12	Research [REDACTED] issues	RHG	3.40
09/21/12	Discussion regarding strategy for pursuing preliminary injunction, [REDACTED] and fraudulent conveyance claims; telephone call to California counsel; emails regarding [REDACTED]; attention to file documents and pleadings; telephone call and email regarding review of recommendations for pursuing recovery v. O'Brien; review emails from M. Russo; telephone call to J. Bowen; email from A. Wiener; email regarding [REDACTED] actions	JFC	4.50
09/22/12	Review documents for production; continue drafting amended complaint; continue drafting motion to amend; work on memo in support of motion for preliminary injunction	JDP	3.90
09/23/12	Continue drafting memorandum in support of preliminary injunction; revisions to amended complaint	JDP	5.00
09/23/12	Research [REDACTED]; draft [REDACTED]	RHG	4.50
09/24/12	Attention to document production; telephone with [REDACTED] regarding investigation; research regarding fraudulent transfers; finalize responses to document requests; continue researching and drafting memorandum in support of preliminary injunction	JDP	6.00
09/24/12	Attention to Amended Complaint; draft and edit Motion for [REDACTED]	RHG	5.30
09/24/12	Review email from A. Wiener; attention to Watched Asset Reports; discussion whether [REDACTED] attention to other discovery issues; conference call regarding production of documents; attention to emails regarding call with California counsel	JFC	2.20

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<u>Date</u>	<u>Description</u>	<u>Timekpr</u>	<u>Hours</u>
09/25/12	Telephone with Matt McGowan; telephone with Steve Bovarnick; telephone with J. Bowen; finalize and serve responses to document requests; finalize and serve document production; attention to email discovery	JDP	4.80
09/25/12	Attention to Amended Complaint; draft and edit Motion for [REDACTED] [REDACTED]	RHG	6.40
09/25/12	Evaluate issues and develop litigation strategy; telephone call to M. McGowan regarding status with case and documents sought by K. O'Brien; telephone call to S. Bovarnick, proposed California counsel; telephone call to J. Bowen regarding response to document request and litigation issues; review and revise verified amended complaint; memorandum of law in support thereof; review case law cited therein; attention to emails	JFC	4.40
09/26/12	Continue revisions to amended complaint; continue revisions to memorandum in support of preliminary injunction; communicate with vendor on electronic discovery; emails with J. Bowen regarding facts; review draft of motion for trustee process	JDP	3.10
09/26/12	Draft and edit Motion for [REDACTED] [REDACTED]	RHG	4.30
09/26/12	Review of memorandum of law; attention to Verified Amended Complaint; evaluate legal issues concerning parallel action in California; research regarding same; review balance owed to Sovereign as alleged in complaint; develop strategy regarding trustee process attachments	JFC	3.30
09/27/12	Review discovery responses; email [REDACTED]; continue drafting court filings	JDP	5.10
09/27/12	Draft and edit Motion for [REDACTED] [REDACTED]; conduct research on [REDACTED] [REDACTED]	RHG	1.70
09/27/12	Review and revise pleadings; attention to issues regarding trustee process; review K. O'Brien's responses to requests for admissions and first set of interrogatories; evaluate strategy for preliminary injunction	JFC	4.80
09/28/12	Review documents produced by O'Brien; review discovery responses; edits to amended complaint; edits to memorandum in support of preliminary injunction; edits to motion to compel; telephone conferences with S. Bovarnick and J. Bowen; email to Russo regarding discovery deficiencies	JDP	5.40

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<u>Date</u>	<u>Description</u>	<u>Timekpr</u>	<u>Hours</u>
09/28/12	Research for and draft Motion to Compel	RHG	6.60
09/28/12	Evaluate issues relating to bank accounts maintained by K. O'Brien; review case law and rules regarding obtainment/standards for temporary restraining orders and preliminary injunction; coordinate filing of Motion for preliminary injunctions; evaluate strategy with local counsel; review discovery response documents produced by K. O'Brien; attention to expert witness disclosure deadline and evaluate whether bank will need experts; email from M. Russo; email from S. Morris regarding [REDACTED]	JFC	5.40
09/29/12	Revisions to amended complaint, memorandum in support of preliminary injunction, and motion to amend; emails with S. Bovarnick and review cases; review documents for production; prepare exhibits	JDP	5.10
09/29/12	Research for and draft Motion to Compel; edit and cite check Motion to Amend the Complaint and Motion for Preliminary Injunction	RHG	2.00
09/29/12	Review and revise memo in support of motion to amend complaint and memo in support of motion for preliminary injunction	JFC	0.80
09/30/12	Legal research regarding personal jurisdiction and [REDACTED] [REDACTED] revisions to motion to amend complaint and research concerning supplementation; continue document review	JDP	7.20

Total Hours for Matter 00051

----- [REDACTED] 181.4

Total Time for Matter 00051

----- [REDACTED] \$49,964.00

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Timekeeper Summary

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
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**Partners**

[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
Coffey, James F.	63.40	360.00	22,824.00

[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
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**Associates**

Gallup, Rebecca H.	34.20	230.00	7,866.00
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[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
Persky, Jonathan D.	83.80	230.00	19,274.00

Total Time for Matter 00051

-----\$49,964.00

Total for Services

-----\$49,964.00

**Summary of Disbursements and Other Charges**

<u>Date</u>	<u>Description</u>	<u>Total</u>
08/29/12	Federal Express	49.23
08/31/12	Computer Aided Research	4.20
08/31/12	Computer Aided Research	90.80
09/04/12	Westlaw	4.35
09/06/12	Messenger Delivery	18.25
09/13/12	Messenger Delivery	15.75
09/13/12	Westlaw	46.68
09/14/12	Westlaw	18.07
09/18/12	Federal Express	17.04
09/19/12	Taxi-Passenger	11.00
09/19/12	Westlaw	239.73
09/20/12	Westlaw	30.15
09/21/12	Westlaw	96.03
09/23/12	Westlaw	196.10
09/24/12	Westlaw	111.51
09/24/12	Telephone	0.12

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09/25/12	Westlaw	197.41
09/25/12	Telephone	0.20
09/26/12	Westlaw	39.11
09/27/12	Westlaw	184.29
09/28/12	Westlaw	63.29
09/29/12	Westlaw	66.29
09/30/12	Westlaw	268.39
09/30/12	Computer Aided Research	50.20

**Total Disbursements and Other Charges**

\$1,818.19

Total of This Bill

----- **\$51,782.19**

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]